## UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Natalia Torres, and Paulina Torres

In re:

NATIONAL REALTY INVESTMENT ADVISORS, LLC, et al., 1

Debtors.

AIRN LIQUIDATION TRUST CO., LLC, in its capacity as Liquidation Trustee of the AIRN LIQUIDATION TRUST, Plaintiff,

v.

MEDIA EFFECTIVE LLC, et al.,

Defendants.

Chapter 11

Case No. 22-14539-JKS

(Jointly Administered)

Adv. Pro. No. 23-1335-JKS

## DECLARATION OF JAVIER TORRES IN SUPPORT OF THE MOTION OF JAVIER TORRES, MEDIA EFFECTIVE, LLC, DORA DILLMAN, JAVIER TORRES, JR., NATALIA TORRES, AND PAULINA TORRES FOR AN ORDER PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 7052

I, Defendant Javier Torres ("Javier"), owner of Media Effective ("Media") and with authority to make this declaration on behalf of Dora Dillman, Javier Torres, Jr., Natalia Torres,

<sup>&</sup>lt;sup>1</sup> A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <a href="https://omniagentsolutions.com/NRIA">https://omniagentsolutions.com/NRIA</a>.

Paulina Torres (the "Torres Family," and collectively with Javier and Media, the "Defendants"), being of full age, submit this declaration in support of Defendants' Motion<sup>2</sup> and state as follows under 28 U.S.C. § 1746:

- 1. In 2012, Media and I began a business relationship with National Realty Investment Advisors, LLC ("NRIA") as a client when NRIA asked Media to be a media buyer for NRIA.
- 2. Throughout our relationship, I, through Media, provided numerous services to NRIA by acting as a media agent for the placement of advertising on radio and television.
- 3. I took NRIA from advertising on one local radio station in 2012 to advertising nationally on multiple radio and television stations in 2022.
- 4. Media and I conducted over ten (10) years of effective negotiations with television and radio stations on NRIA's behalf.

I declare under penalty of perjury that, to the best of my knowledge and after reasonable inquiry, the foregoing is true and correct.

Dated: June 21, 2024

/s/ Javier Torres

JAVIER TORRES

<sup>&</sup>lt;sup>2</sup> Capitalized terms used in this Declaration but not defined herein shall have the meanings ascribed to such terms in the Motion.